

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	
Lehman Brothers Inc.,)	Case No. 08-01420 (JMP) SIPA
Debtor.)	
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In re:)	Chapter 11
Lehman Brothers Holdings Inc., <u>et al.</u>)	Case No. 08-13555 (JMP) (Jointly Administered)
Debtors.)	
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**STIPULATION CONCERNING SCHEDULING
BETWEEN THE DEBTORS, TRUSTEE, COMMITTEE
AND BARCLAYS CAPITAL INC.**

This Stipulation concerning Scheduling (the “Stipulation”) is entered into by and between the undersigned counsel, acting for and on behalf of their respective clients: (a) Lehman Brothers Holdings, Inc. (“LBHI”) and its affiliated debtors and debtors-in-possession in the Chapter 11 Cases (collectively, the “Debtors”); (b) James W. Giddens, as Trustee in the Securities Investor Protection Act Liquidation of Lehman Brothers Inc. (the “Trustee”); (c) the Official Committee of Unsecured Creditors of Lehman Brothers Holdings, Inc. and its affiliated debtors and debtors in possession (the “Committee”) (Debtors, Trustee and Committee, the “Discovery Parties”, and each a “Discovery Party”); and (d) Barclays Capital Inc. and its affiliates (“Barclays”).

WHEREAS, on September 15, 2009: (i) LBHI filed Debtor’s Motion for an Order, Pursuant to Fed.R.Civ.P. 60 and Fed.R.Bankr.P. 9024, Modifying the September 20, 2008 Sale Order and Granting Other Relief; (ii) The Trustee filed The Trustee’s Motion for Relief Pursuant

to the Sale Orders or, Alternatively, for Certain Limited Relief under Rule 60(b); and (iii) the Committee filed the Motion of Official Committee of Unsecured Creditors of Lehman Brothers Holdings Inc., Et Al., Pursuant to 11 U.S.C. § 105(a), Fed. R. Civ. P. 60(b), and Fed. R. Bankr. P. 9024, for Relief from Order under 11 U.S.C. §§ 105(a), 363, and 365 and Federal Rules of Bankruptcy Procedure 2002, 6004 and 6006 Authorizing and Approving (A) Sale of Purchased Assets Free and Clear of Liens and Other Interests and (B) Assumption and Assignment of Executory Contracts and Unexpired Leases, Dated September 20, 2008 (and Related SIPA Sale Order) and Joinder in Debtors' and SIPA Trustee's Motions for an Order under Rule 60(b) to Modify Sale Order (collectively referred to hereinafter as the "Discovery Parties' Rule 60 Motions");

WHEREAS, the Discovery Parties' Rule 60 Motions each have an Objection Deadline of October 9, 2009 and a Hearing Date of October 15, 2009;

WHEREAS, Barclays has requested, and LBHI, the Trustee and the Committee have each agreed to an adjournment of the above-referenced Objection Deadline and Hearing Date;

NOW, THEREFORE, IT IS HEREBY STIPULATED, AGREED, AND UPON COURT APPROVAL HEREOF, IT IS ORDERED THAT:

1. The Hearing Date is adjourned, provided that Barclays and the Discovery Parties will conduct a scheduling conference in open Court on October 15, 2009 with respect to the Discovery Parties' Rule 60(b) Motions.

2. Solely with respect to Barclays, the Objection Deadline and Hearing Date for the Discovery Parties' Rule 60 Motions are adjourned until such dates and times as Barclays and the Discovery Parties may agree to and/or the Court may order.

Dated: October 7, 2009
New York, New York

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SO ORDERED: this 14th day of October 2009

s/ James M. Peck
HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE